

CHAPMAN, LEWIS & SWAN

ATTORNEYS AT LAW

501 First Street

Post Office Box 428

CLARKSDALE, MISSISSIPPI 38614

662-627-4105

Fax 662-627-4171

Annex Fax 662-621-2538

clsaw@chapman-lewis-swan.com

www.chapman-lewis-swan.com

JENNY VIRDEN

129 Executive Drive, Suite A

Madison, Mississippi 39110

601-605-9081

FAX 601-605-9765

RALPH E. CHAPMAN

RICHARD B. LEWIS

DANA J. SWAN

DANIEL M. CZAMANSKE, JR.

MICHAEL A. JACOB, II

SARA B. RUSSO

January 4, 2006

Kathleen Farrell-Willoughby
United States Bankruptcy Clerk
P. O. Box 5058
New York, New York 10274-5058

In re: Delphi Corporation, et al.
Case No.: 05-44481 (RDD)
Chapter 11

Dear Ms. Farrell-Willoughby:

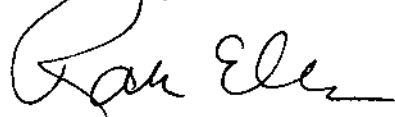
Enclosed herewith for filing, please find the original and one of our Motion for Relief from Automatic Stay, as well as the original and one of our Proof of Claim, our check in the amount of \$150.00, and a self-addressed stamped envelope.

Please mark the copies "filed", and return them to me in the envelope provided.

Thanks.

Sincerely yours,

CHAPMAN, LEWIS & SWAN

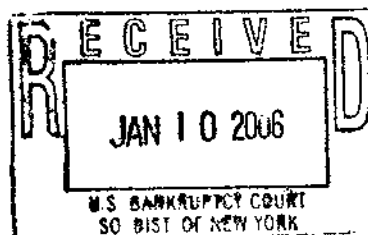


Ralph E. Chapman

REC/bw

Enclosures

cc: Honorable Robert D. Drain, U. S. Bankruptcy Judge
John Wm. Butler, Jr., Esq.
John K. Lyons, Esq.
Ron E. Meisler, Esq.
Kayalyn A. Marafioti, Esq.
Thomas J. Matz, Esq.



IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

DELPHI CORPORATION, et al.,

Debtors.

)
) Chapter 11
)

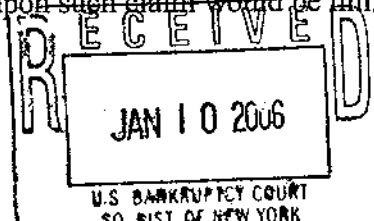
) Case No. 05-44481 (RDD)
)

) (Jointly Administered)
)

MOTION FOR RELIEF FROM AUTOMATIC STAY

COMES NOW, Martin L. Shannon Shaw, Movant, and , pursuant to 11 U.S.C. § 362(d), moves that the Court terminate the automatic stay under 11 U.S.C. § 362 upon the terms and conditions hereinafter set forth and, in support of their motion, state:

1. Movant has a cause of action against Delphi Automotive Systems, LLC, for an accident which occurred on October 20, 2002, resulting in injuries and damages to the Movant. Movant has prepared and filed a lawsuit in the Circuit Court of Montgomery County, and a copy was served on the debtor on or about 4/17/03. More recently, the matter was removed to the United States District Court for the Northern District of Mississippi, Western Division, and Motion to Remand has been filed, but an Order regarding the remand has not yet been entered.
2. On or about October 21, 2005, the Debtor forwarded a Notice of Commencement of Chapter 11 Bankruptcy Cases and meeting of Creditors regarding, among others, Delphi Automotive Systems, LLC.
3. Movant, in consideration of the court's granting relief from the automatic stay of 11 U.S.C. §, 362, agrees to limit any recovery upon any claim arising out of his damages on October 20, 2002, to the proceeds of any applicable policy of insurance and agrees that any judgment which might be entered pursuant to litigation upon such claim would be limited to the proceeds



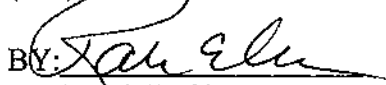
of such policy and would not be a claim against other assets of Debtor.

4. The granting of relief from the automatic stay would not create any liability upon Debtor nor would it interfere with the administration of Debtor or the reorganization thereof.

WHEREFORE, Martin L. Shannon Shaw, Movant herein, moves, pursuant to 112 U.S.C. §362(d), that the Court terminate the automatic stay, upon the terms and conditions hereinabove set forth, as to litigation of Movant's claims arising out of damages sustained by him in an occurrence on October 20, 2002.

MARTIN L. SHANNON SHAW
Movant

BY: RALPH E. CHAPMAN
Attorney at Law
P. O. Box 428
Clarksdale, MS 38614
(662)627-4105

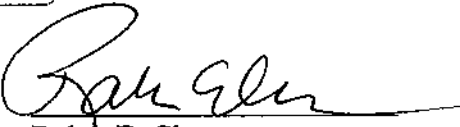
BY: 
Ralph E. Chapman

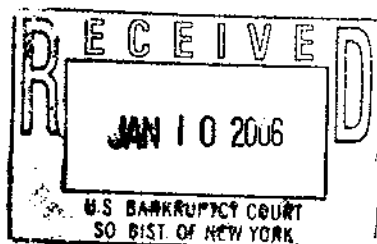
CERTIFICATE OF SERVICE

I, Ralph E. Chapman, do hereby certify that I have this day mailed, postage prepaid, a true and correct copy of the above and foregoing to:

See attached mailing matrix.

THIS, The 4th day of Jan, 2006.


Ralph E. Chapman



MATRIX

John Wm. Butler, Jr., Esq.

John K. Lyons, Esq.

Ron E. Meisler, Esq.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

333 West Wacker Drive, Suite 2100

Chicago, Illinois 60606

Kayalyn A. Marafioti, Esq.

Thomas J. Matz, Esq.

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

Four Times Square

New York, New York 10036